



FAIR POLITICAL PRACTICES COMMISSION

128 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

June 29, 2010

Ms. Deborah Cash, Executive Director
San Luis Obispo Downtown Association

REDACTED

Re: FPPC No. 07/468; San Luis Obispo Downtown Association

Dear Ms. Cash:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act").¹ found in Government Code section 81000, et seq. As you may be aware, the FPPC received a complaint alleging that the San Luis Obispo Downtown Association (the "SLO-DA") violated the Act by expending public funds for campaign activity. Specifically, the complaint alleged that SLO-DA violated Section 81002 (reporting of receipts and expenditures), Section 84200-84225 (failing to file campaign statements), and Section 84301 (making contributions in a name other than ones legal name).

The FPPC has completed its investigation of the complaint filed against SLO-DA in the above-referenced matter. Our investigation has determined that there is insufficient evidence to determine that SLO-DA committed a violation of the Act. FPPC Regulation 18423 requires that campaign activity by employees in excess of 10% of their compensated time in any one month be disclosed as a contribution. Our investigation showed that the alleged campaign activity by the SLO-DA did not surpass this threshold. Though the SLO-DA discussed engaging in some campaign activity, none of the discussions led to actual campaign activity on the part of SLO-DA because the SLO-DA became aware that engaging in such activity could possibly lead to violations of the Act. As a result of finding no evidence that SLO-DA's activity rose to the level of a violation of the Act, we are closing this case without taking any further action.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18109 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

Ms. Deborah Cash
June 29, 2010
Page 2

If you have any questions regarding this matter, please feel free to contact me at 916-322-5660.

Sincerely,

REDACTED

Sukhi K. Brar
Commission Counsel
Enforcement Division

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